

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM DEREK WILLIAMS,
[DOB: 8/9/1979],

Defendant.

Case No. _____

COUNT ONE:

Production of Child Pornography

18 U.S.C. § 2251(a) & (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life
Class B Felony

COUNT TWO:

Production of Child Pornography

18 U.S.C. § 2251(a) & (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life
Class B Felony

COUNT THREE:

Production of Child Pornography

18 U.S.C. § 2251(a) & (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life
Class B Felony

COUNT FOUR:

Possession of Child Pornography

18 U.S.C. § 2252(a)(4)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life
Class C Felony

\$100 Mandatory Special Assessment Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about July 31, 2018, and September 6, 2018, in the Western District of Missouri, **WILLIAM DEREK WILLIAMS**, defendant herein, did knowingly use a minor, MINOR VICTIM 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, separate and apart from the visual depictions relied upon in all other counts of this indictment, which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and attempted to do so, all in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT TWO

Between on or about August 16, 2016, and May 21, 2017, in the Western District of Missouri, **WILLIAM DEREK WILLIAMS**, defendant herein, did knowingly use a minor, MINOR VICTIM 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, separate and apart from the visual depictions relied upon in all other counts of this indictment, which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and attempted to do so, all in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT THREE

Between on or about January 1, 2013, and July 14, 2017, in the Western District of Missouri, **WILLIAM DEREK WILLIAMS**, defendant herein, did knowingly use a minor, MINOR VICTIM 3, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, separate and apart from the visual depictions relied upon in all other

counts of this indictment, which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and attempted to do so, all in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FOUR

On or about September 8, 2018, in the Western District of Missouri, **WILLIAM DEREK WILLIAMS**, defendant, knowingly possessed one or more films, videotapes and other matter, which contained one or more visual depictions, separate and apart from the visual depictions relied upon in all other counts of this indictment, which were produced using materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in sexually explicit conduct, and were visual depictions of such conduct, all in violation of Title 18, United States Code, Section 2252(a)(4).

TRUE BILL.

/s/ Kathryn Varnon

FOREPERSON OF THE GRAND JURY

/s/ David Luna

David Luna
Assistant United States Attorney

Date: 2/12/19
Kansas City, Missouri